

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

BRENDA WHITTAKER, individually and	)	Civil Action No. 2:22-cv-00672-RMG
on behalf of all others similarly situated,	)	
	)	
Plaintiff,	)	<b><u>DEFENDANTS' ANSWERS TO</u></b>
	)	<b><u>LOCAL RULE 26.01</u></b>
vs.	)	<b><u>INTERROGATORIES</u></b>
	)	
AWESOME REI, LLC, a South Carolina	)	
limited liability company, and PATRICK	)	
RIDDLE, an individual,	)	
	)	
Defendants.	)	
	)	

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Pursuant to Local Civil Rule 26.01, D.S.C., Defendants Awesome REI, LLC (“Awesome REI”) and Patrick Riddle (“Riddle”), by and through their undersigned counsel, submit the following responses:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE:** None known.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE:** Plaintiff has demanded a jury trial. However, issues concerning certification of the putative class should be determined nonjury.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE:** Awesome REI is not a publicly owned company.

- (1) No publicly-held corporation owns 10% or more of Awesome REI.
- (2) Awesome REI is not a parent company to any publicly-owned company.
- (3) Awesome REI does not own 10% or more of the outstanding shares of any publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of a challenge to the appropriateness of the division).

**RESPONSE:** Awesome REI does not challenge the appropriateness of the division in which Plaintiff filed this suit.

(E) Is this action related in whole or in part to another matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transaction, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE:** Awesome REI is not aware of any other matters that may be related to this action.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE:** Awesome REI is not improperly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE:** Awesome REI did not send the text messages on which Plaintiff's complaint is based. To the extent Plaintiff seeks to hold Defendant liable for text messages sent by third-parties, those third parties may be liable to Awesome REI.

Awesome REI expressly reserves the right to supplement this or any of the foregoing responses and disclosures as necessary.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Patrick Riddle*

Charleston, South Carolina  
April 25, 2022